



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

April 2022 Grand Jury

UNITED STATES OF AMERICA,

No. 8:22-cr-00120-JVS

Plaintiff,

I N D I C T M E N T

v.

GUILLERMO ALEJANDRO FLORES,

[21 U.S.C. §§ 841(a)(1),
(b)(1)(A)(viii): Possession with
Intent to Distribute
Methamphetamine; 18 U.S.C.
§ 924(c)(1)(A)(i): Possession of a
Firearm in Furtherance of a Drug
Trafficking Crime; 18 U.S.C.
§ 922(k): Possession of a Firearm
Bearing an Obliterated Serial
Number; 21 U.S.C. § 853, 18 U.S.C.
§ 924, 28 U.S.C. § 2461(c): Criminal
Forfeiture]

Defendant.

The Grand Jury charges:

COUNT ONE

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

On or about December 2, 2021, in Orange County, within the
Central District of California, defendant GUILLERMO ALEJANDRO FLORES
knowingly and intentionally possessed with intent to distribute at
least 50 grams, that is, approximately 60 grams, of methamphetamine,
a Schedule II controlled substance.

1 COUNT TWO

2 [18 U.S.C. § 924(c)(1)(A)(i)]

3 On or about December 2, 2021, in Orange County, within the
4 Central District of California, defendant GUILLERMO ALEJANDRO FLORES
5 knowingly possessed a firearm, namely, an Intratec, model AB-10, 9mm
6 caliber pistol with an obliterated serial number, in furtherance of a
7 drug trafficking crime, namely, possession with intent to distribute
8 methamphetamine, in violation of Title 21, United States Code,
9 Sections 841(a)(1), (b)(1)(A)(viii), as charged in Count One of this
10 Indictment.

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1 COUNT THREE

2 [18 U.S.C. § 922(k)]

3 On or about December 2, 2021, in Orange County, within the
4 Central District of California, defendant GUILLERMO ALEJANDRO FLORES
5 knowingly possessed a firearm, namely, an Intratec, model AB-10, 9mm
6 caliber pistol, that had been shipped and transported in interstate
7 commerce, from which defendant FLORES knew the manufacturer's serial
8 number had been removed, obliterated, and altered.

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1 FORFEITURE ALLEGATION ONE

2 [21 U.S.C. § 853; 18 U.S.C. § 924; 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 21,
6 United States Code, Section 853, Title 18, United States Code,
7 Section 924, and Title 28, United States Code, Section 2461(c), in
8 the event of the defendant's conviction of the offense set forth in
9 Count One of this Indictment.

10 2. The defendant, if so convicted, shall forfeit to the United
11 States of America the following:

12 a) All right, title and interest in any and all property,
13 real or personal, used, or intended to be used, in any manner or
14 part, to commit, or to facilitate the commission of such offense;

15 b) All right, title, and interest in any firearm or
16 ammunition involved in or used in such offense, including but not
17 limited to the following:

18 i. One Intratec, model AB-10, 9mm caliber pistol
19 with an obliterated serial number; and

20 ii. 74 rounds of 9mm Luger caliber ammunition; and

21 c) To the extent such property is not available for
22 forfeiture, a sum of money equal to the total value of the property
23 described in subparagraphs (a) and (b).

24 3. Pursuant to Title 21, United States Code, Section 853(p),
25 and as incorporated by Title 28, United States Code, Section 2461(c),
26 the defendant, if so convicted, shall forfeit substitute property if,
27 by any act or omission of the defendant, the property described in
28 the preceding paragraph, or any portion thereof: (a) cannot be

1 located upon the exercise of due diligence; (b) has been transferred,
2 sold to, or deposited with a third party; (c) has been placed beyond
3 the jurisdiction of the Court; (d) has been substantially diminished
4 in value; or (e) has been commingled with other property that cannot
5 be divided without difficulty.

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1 FORFEITURE ALLEGATION TWO

2 [18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 18,
6 United States Code, Section 924(d)(1), and Title 28, United States
7 Code, Section 2461(c), in the event of the defendant's conviction of
8 the offenses set forth in Counts Two or Three of this Indictment.

9 2. The defendant, if so convicted, shall forfeit to the United
10 States of America the following:

11 a) All right, title, and interest in any firearm or
12 ammunition involved in or used in any such offense, including but not
13 limited to the following:

14 i. One Intratec, model AB-10, 9mm caliber pistol
15 with an obliterated serial number; and

16 ii. 74 rounds of 9mm Luger caliber ammunition; and

17 b) To the extent such property is not available for
18 forfeiture, a sum of money equal to the total value of the property
19 described in subparagraph (a).

20 3. Pursuant to Title 21, United States Code, Section 853(p),
21 as incorporated by Title 28, United States Code, Section 2461(c), the
22 defendant, if so convicted, shall forfeit substitute property, up to
23 the value of the property described in the preceding paragraph if, as
24 the result of any act or omission of the defendant, the property
25 described in the preceding paragraph or any portion thereof

26 (a) cannot be located upon the exercise of due diligence; (b) has
27 been transferred, sold to, or deposited with a third party; (c) has
28 been placed beyond the jurisdiction of the Court; (d) has been

1 substantially diminished in value; or (e) has been commingled with
2 other property that cannot be divided without difficulty.

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A TRUE BILL

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/s/

Foreperson

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8 STEPHANIE S. CHRISTENSEN
9 Acting United States Attorney



10
11 SCOTT M. GARRINGER
12 Assistant United States Attorney
13 Chief, Criminal Division

14 BENJAMIN R. BARRON
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